

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 1:23-cv-00108-LMB-JFA

**AMAZON.COM INC.’S REQUEST TO SEAL DOCUMENTS AND DATA AT
REMEDIES TRIAL**

Pursuant to the Court’s Order Regarding Pre-trial Schedule and Procedures (ECF No. 1560), which directed any “third party who objects to the public use of confidential documents” to “file a request to seal pursuant to Local Civil Rule 5,” third party Amazon.com Inc. (“Amazon”), through its undersigned counsel, respectfully requests that the Court redact and seal certain of Amazon’s documents and data files included on the parties’ exhibit lists, consistent with the same redactions and sealing that this Court ordered in the liability trial in this case. Specifically, Amazon requests that the Court order Google to redact AMZNDOJ0159229 (RDTX297) and keep under seal AMZNDOJ0023642 (RDTX349) and AMZNDOJ0247645 (RDTX990).¹ Amazon further requests that the Court order Plaintiffs to keep under seal the data derived from AMZNADTECH-AGG-LIT-00000003.001, as Plaintiffs have represented is reflected in PRX136. As explained in the accompanying memorandum of law, these documents and data contain information that

¹ Unredacted copies of these exhibits have been filed under seal as Exhibits A, B, and C. Proposed redactions to RDTX297 have been publicly-filed as Exhibit E; they are also indicated on Exhibit A with a red box around the relevant text.

Amazon has consistently designated as highly confidential or confidential under the Protective Order (ECF No. 98; modified at ECF No. 203), and public disclosure of this information would cause harm to Amazon's competitive position. Amazon has attached a proposed order for the Court's convenience.

Dated: September 5, 2025

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Michael R. Dziuban

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Attorney for Third Party Amazon.com Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September 2025, I caused to be electronically filed the foregoing Request to Seal Documents and Data at Remedies Trial using the CM/ECF system, which will then send a notification of such filing to all counsel registered through CM/ECF.

/s/ Michael R. Dziuban

Michael R. Dziuban

Counsel for Third Party

Amazon.com Inc.